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ATTORNEYS FOR FORD MOTOR CREDIT COMPANY LLC

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:	§	
	§	
BRANDON KIRKLAND & KRISTIN PYLES,	§	CASE NO. 13-70406-HDH-13
DEBTORS.	§	
	§	
BRANDON KIRKLAND & KRISTIN PYLES,	§	Objection to Confirmation
MOVANTS	§	Set:
	§	FEBRUARY 12, 2014 AT 10:00 A.M.
VS.	§	
	§	
FORD MOTOR CREDIT COMPANY LLC,	§	
RESPONDENT.	§	

OBJECTION TO CONFIRMATION

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

COMES NOW, Ford Motor Credit Company LLC, Creditor, objecting to the confirmation of the Chapter 13 Plan proposed by Brandon Kirkland & Kristin Pyles ("Debtors") and for cause of action would respectfully show the Court as follows:

1. Creditor has a perfected security interest in a 2013 Ford F150, vehicle identification number 1FTFW1CF8DKE55753. As of the date of filing, Creditor was owed \$8,776.81.
2. Debtor's Plan proposes to pay Creditor direct which is acceptable to Creditor with the following provisions. The Plan should contain the following statement: In the event the last payment due on this secured claim is due after the date on which the final payment under the plan is due, this secured claim is subject to 11 U.S.C. § 1322(b)(5) and discharge of this secured claim

is subject to the provisions of 11 U.S.C. §1328 (a) and (c). The Motion for Valuation, set out in Section III of the Plan, does not include a request for the valuation of assets listed for payment in Section G of the Plan. Section G of the Plan in this case includes the proposal by the Debtor to repay the debt owed to Creditor which is secured by the vehicle described herein. Additionally, since Creditor is being paid directly, value of the collateral is irrelevant. Therefore, any value set forth in the Chapter 13 Plan should not be binding on Creditor for any purpose. The Plan must provide that Creditor retains its lien on the vehicle described herein until it is paid in full pursuant to the terms of its contract with the Debtors. Finally, the plan should not be confirmed unless Debtors are current on all direct payments to Creditor.

WHEREFORE, PREMISES CONSIDERED, Creditor prays for an Order of this Court:

1. Denying confirmation of Debtors' Chapter 13 Plan as proposed; and
2. For such other and further relief, both general and specific, to which Creditor may show itself justly entitled.

Respectfully submitted,

/s/ Stephen G. Wilcox

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CREDIT COMPANY LLC

CERTIFICATE OF CONFERENCE

I, the undersigned, hereby certify that prior to the filing of this Objection, I did the following:

My office contacted Debtors' attorney or Debtors' attorney's assistant and was advised that there was no opposition to the Objection.

/s/ Stephen G. Wilcox

Stephen G. Wilcox,

Clare Russell

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Objection to Confirmation was served by FIRST CLASS MAIL, POSTAGE PRE-PAID on:

Brandon Kirkland & Kristin Pyles
2900 Stephens Street
Vernon, TX 76384

and ELECTRONICALLY SERVED on:

Monte White
Hamilton Place
1106 Brook Avenue
Wichita Falls, TX 76301

Walter O'Cheskey
6308 Iola Avenue
Lubbock, TX 79424

Dated on January 28, 2014.

/s/ Stephen G. Wilcox
Stephen G. Wilcox,
Clare Russell

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